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February 15, 2016

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: January 2016 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Received
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Office of Air, Waste & Toxics

FILE COPY

Dear Ms. Palumbo:

This letter provides the January 2016 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from January 15, 2016, to February 14, 2016.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Results from the groundwater monitoring from the week of December 8, 2015 were received in late January and the data was validated in early February. The Second Half 2015 Pilot Study O&M Report will be submitted early March. Results are attached to this progress report in table format and time-series plots. Some initial conclusions regarding the data:
 - MW-3 had a significant drop in PCP from 1500 ug/L to 280 ug/L. This well is located between the infiltration trench and the extraction wells. It appears that the lack of operation of the recirculation trench was the cause of the 1500 ug/L outlier, although the PCP concentration in MW-3 has regularly fluctuated.
 - MW-22 had a significant drop in PCP (went from 380 ug/L in 9/2015 to 37 ug/L in 12/2015).
 - MW-34 continued to have a lower PCP result after the high detection in Q1 2015; it was 1800 ug/L in 2/2015, but was 100 ug/L in 9/2015 and 54 ug/L in 12/2015. The high concentration in Q1 2015 is likely due to the recirculation system being out of operation; while the decreasing concentration are a result of it being back in operation.
 - MW-36 is continuing is downward trend which started after the rehab work done in the summer. This well is directly downgradient of the extraction system.
 - MW-39 has been at an all-time low for 9/2015 (21 ug/L) and 12/2015 (24 ug/L) after having 100 ug/L or higher detections starting in 3/2014. This is a deep well located downgradient of the extraction system.



- MW-40 showed a spike in concentration of PCP to 800 ug/L in 12/2015. This is a deep well located downstream of the recirculation system. Well 34 had a spike in concentration when the system was down; well MW-40 is located downstream of well MW-34. This may be a reflection of that spike in concentration. If so, we should see a decrease in the concentration during the next sampling event, similar to the decrease we observed at MW-34 after the system was running.
- MW-41 detections have been scattered over the past few years, but the 12/2015 detection was 430 ug/L which is slightly higher than the previous sampling event.

Generally concentrations have decreased with the exception of the deep wells downgradient of the recirculation system, which are expected to decrease as the effects of the system operating reach those wells.

- In August and early September, the CMS was revised (Version 4) to incorporate the results of the oxidation bench scale study and incorporate EPA comments. EPA informed the Baxter team that Battelle had been contracted to review the data from the site and provide corrective measure recommendations to EPA. EPA requested that the Baxter team place the CMS on hold until the Battelle report is completed and EPA and Baxter teams have met to discuss the ramifications of the Battelle recommendations. No work was conducted on the CMS this month pending direction from EPA.
- The recirculation trench continues to operate. The pump at EW-05 was repaired and is operating at 6-8 gpm. EW-01, EW-02, EW-04, and EW-05 are all currently running. The system is circulating at a total flowrate of 35-38gpm. The design flowrate is ~40gpm or higher. Since rehabilitating the trench, we have not had a shutdown due to high water levels in the infiltration trench.
- The oxygen tanks in the iSOC wells were replaced. All three were in good condition. It appears that the oxygen is immediately consumed based on dissolved oxygen level dropping quickly during well purging.
- The Second Half 2015 Pilot Study O&M report is under preparation and will be delivered to EPA in March 2016.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- EPA will provide the Baxter team with the Battelle report and set up a technical meeting to discuss the path forward.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.



- Groundwater monitoring was conducted the week of December 8, 2015 and the results are included in table format and graphs.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

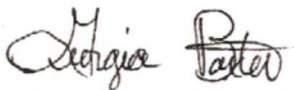
Name: Georgia Baxter

Title: Chief Executive Officer

Date: February 15, 2016

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

